



Eric M. Creizman
Partner
(212) 735-8640
ecreizman@morrisoncohen.com

Via ECF

May 29, 2024

The Honorable Joan M. Azrack
United States District Judge
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

**Re: *United States v. Adam Kaplan and Daniel Kaplan,*
 Index No. 23-CR-293 (JMA) (JMW)**

Dear Judge Azrack:

On behalf of Adam Kaplan, we respectfully join in co-defendant Daniel Kaplan's opposition to the designation of this case as "complex" for the purposes of the Speedy Trial Act.

Respectfully,

/s/ Eric M. Creizman
Eric M. Creizman

cc: AUSAs Adam Toporovsky and Paul Scotti (by ECF)
 Michael Tremonte, Esq. (by ECF)